From: PETERSON Jenn L

Burt Shephard/R10/USEPA/US@EPA To:

Eric Blischke/R10/USEPA/US@EPA; rgensemer@parametrix.com

Subject: RE: Draft Food Web Model Comments

Date: 06/16/2008 09:19 AM

My comments stated that if we can't derive general TRV for invertebrates as a group, to derive species specific TRVs where available. This approach is more reliable than not addressing risk at all.

---Original Message---From: Shephard.Burt@epamail.epa.gov From: Shephard.Burt@epamail.epa.gov [mailto:Shephard.Burt@epamail.epa.gov]
Sent: Friday, June 13, 2008 12:09 PM
To: PETERSON Jenn L
Cc: Blischke.Eric@epamail.epa.gov; Shephard.Burt@epamail.epa.gov;

rgensemer@parametrix.com Subject: RE: Draft Food Web Model Comments

Jennifer,

I also asked Eric for a few days into next week to provide FWM comments, since I'm trying to finish up the tissue TRVs and bioassay interpretation framework before getting to the FWM. Eric said fine yesterday afternoon.

Regarding the suggestions in the tissue TRV methods to derive values for PAHs, attached are several papers that demonstrate rapid metabolic transformation of PAHs in invertebrate species as varied as soft-shell and littleneck clams, crayfish, fingernail clams, Chironomus riparius and Nereis virens. The problem with deriving PAH tissue TRVs isn't that you can't do it at all, or for some species. You can. The problem is that the ability to rapidly metabolically transform PAHs into other compounds cuts across taxa, making it difficult to derive a generally applicable TRV for PAHs. Thus, we've decided not to ask LWG to derive PAH tissue TRVs, we don't think they would be reliable enough to use in the BERA. the BERA

Best regards,

Burt Shephard Risk Evaluation Unit Office of Environmental Assessment (OEA-095) U.S. Environmental Protection Agency, Region 10 1200 6th Avenue Seattle, WA 98101

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"If your experiment needs statistics to analyze the results, then you ought to have done a better experiment"
- Ernest Rutherford

(See attached file: Jorgensen et al 2005.pdf)(See attached file: Borchert et al 1997.pdf)(See attached file: Jewell et al 1997.pdf)(See attached file: Simpson et al 2002.pdf)

"PETERSON Jenn <PETERSON.Jenn@d eq.state.or.us> 06/13/2008 09:19

Eric Blischke/R10/USEPA/US@EPA, Burt Shephard/R10/USEPA/US@EPA Chip Humphrey/R10/USEPA/US@EPA Subject
RE: Draft Food Web Model Comments

I won't be able to look at these until Monday. Hopefully you can wait that long?

---Original Message--

From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Thursday, June 12, 2008 9:34 AM
To: PETERSON Jenn L; Shephard.Burt@epamail.epa.gov
Cc: Humphrey.Chip@epamail.epa.gov
Subject: Draft Food Web Model Comments

Attached are the food web model comments. It is basically a compilation of comments from Larry and Jennifer with my own comments thrown in on the BSAFs. These need to go out tomorrow. Please review. I have included a handful of margin comments that lay out some of my questions to focus the review. I will be out of the office but Chip will take the lead in getting these out.

Thanks, Eric

(See attached file: AppendixEComments061208.doc)